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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: July 15, 1997

SUBJECT: Proposed Plan for the 12th Street Landfill Operable Unit of the Allied Paper/Kalamazoo River Site

FROM: Richard Boice, RPM
Superfund Division

TO: Addressees

Attached for your information is the Proposed Plan for the 12th Street Landfill, which is an operable unit for the Allied Paper/Kalamazoo River site. The draft ROD proposes to require the following remedy components:

- Excavation of nearby PCB contaminated residuals in surrounding wetlands and Kalamazoo River, and consolidation of the residuals into the main part of the 12th Street Landfill.
- Construction of a Solid Waste Landfill cover over the entire KHL.
- Erosion protection.
- Monitoring, maintenance, access restrictions, and deed restrictions.

Addressees:

Wendy Carney, Branch Chief, SD, SR-6J
Sally Averill, Section Chief, SD, SR-6J
Eileen Fury, Regional Counsel, C-29A
Jean Greensley, Toxics Program Section, DRT-14J
John Connel, Toxics Program Section, DRT-14J (memo only)
Phyllis Reed, Pest. and Toxics Branch, DRT-14J (memo only)
Judy Kleiman, Waste Management Branch, DRP-8J
Norman Neidergang, WPT Div., D-8J (memo only)
Bonnie Eleder, Sediment Team, T-13J
Judy Beck, Lake Michigan Team & GLNPO, T-13J
Marsha Damato, RAP Coord. & Water Div., W-15J
Jo Lynn Traub, Water Div., W-15J (memo only)
Hiedi Valetchevitch, State Coordinator, P-19J
Cheryl Allen, Public Affairs, P-19J (memo only)
James Chapman, Ecologist, SRT-4J
Robin M. Anderson, 5202G
Louis Fabinski, ATSDR
Todd Goeks, CRC5, NOAA, SRT-4J

July 1997

Proposed Plan Fact Sheet

Allied Paper, Inc./ Portage Creek/Kalamazoo River Superfund Site

12th Street Landfill Operable Unit No. 4 Allegan County, Michigan

Inside this Proposed Plan Fact Sheet:

This Proposed Plan is issued by the Michigan Department of Environmental Quality (MDEQ), the lead regulatory agency for this Superfund site, to fulfill the requirements of the *Comprehensive Environmental Response, Compensation and Liability Act* (*CERCLA*), Section 117(a). The MDEQ is provided technical support on this site by the U.S. Environmental Protection Agency (EPA).

A Public Meeting will be held Wednesday, August 13, 1997 at 7:00 PM.

At the Plainwell Comfort Inn (616-685-9891) located at 622 Allegan Highway in Plainwell, Michigan.

Comments may be submitted either verbally or in writing at the public meeting, or you can send written comments postmarked no later than August 30, 1997 to the MDEQ. Comments can also be E-mailed or faxed by August 30, 1997 (see Page 10 for MDEQ addresses and fax number).

◆ *Introduction* ◆

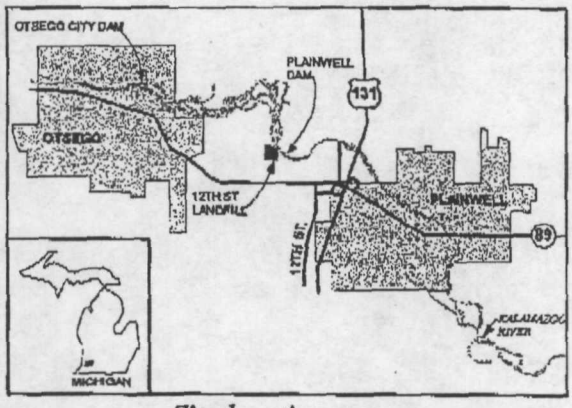
This Proposed Plan Fact Sheet describes the remedial options being considered for the 12th Street Landfill *Operable Unit (OU)* No. 4 of the Allied Paper, Inc./Portage Creek/ Kalamazoo River Superfund Site. The 12th Street Landfill is located adjacent to the Kalamazoo River on 12th Street near Plainwell, Michigan (see map on Page 2). This Proposed Plan also identifies the nature and extent of contamination, the risks associated with the site, remedial alternatives, and the preferred remedial alternative along with a rationale for its preference.

This Proposed Plan summarizes information that can be found in greater detail in the *Remedial Investigation (RI)* report, *Focused Feasibility Study (FFS)* report, other supporting documents prepared for the 12th Street Landfill, and the *Risk Assessment (RA)* report for the King Highway Landfill OU. The MDEQ believes that the analysis of risks related to paper residual disposal areas is reasonably characterized by the King Highway Landfill RA and can be applied to the 12th Street Landfill OU.

The public is encouraged to comment on the remedial alternatives described in this Proposed Plan. To encourage public participation in the remedy selection process, the MDEQ has set a public comment period from August 1 through August 30, 1997 (see Community Participation Section on Page 9). The final remedy for the 12th Street Landfill will be jointly selected by the MDEQ and EPA. This will occur only after review and consideration of information provided during the public comment period. The final remedy, which will be presented in the *Record of Decision (ROD)*, could differ from the Proposed Plan, depending upon new information or input the MDEQ may receive during the public comment period.

◆ *Site Background* ◆

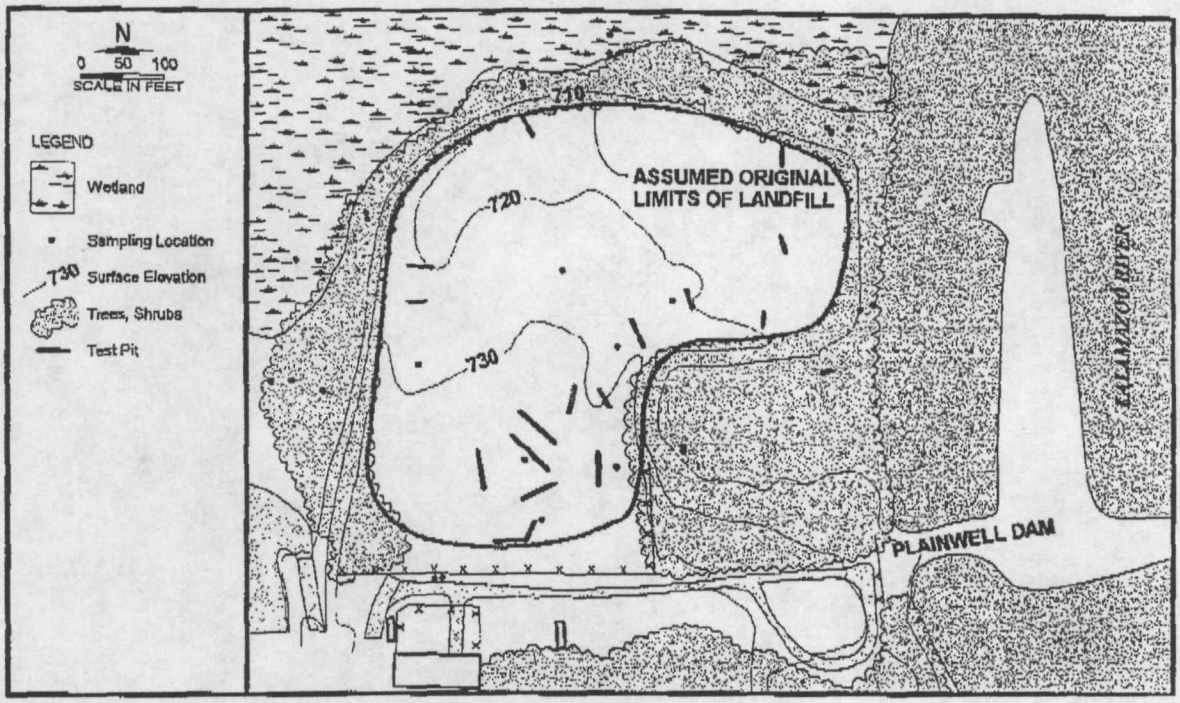
Site History. The 12th Street Landfill OU is located adjacent to the Kalamazoo River in Otsego Township, approximately 1½ miles northwest of the City of Plainwell in Allegan County, Michigan. More specifically, it is located in the middle of Section 24, Township 1N, Range 12W. The site characteristics are shown on the site map (Page 3). The 12th Street Landfill was used from 1955 to 1981 for the disposal of paper-making *residuals*. The residuals consist mostly of water, wood fiber, and clay. It is believed that *polychlorinated biphenyls (PCBs)* were introduced into the residuals between 1957 and 1962 as a result of the recycling of carbonless copy paper during operations at a paper mill now owned by Simpson Plainwell Paper Company. PCBs are considered a hazardous substance and probably human carcinogen.



Site location map

The 12th Street Landfill was covered with soil and seeded in 1984. The top is now vegetated by grass and shrubbery. The north, east, and west sides of the landfill contain PCB-contaminated residuals that have the potential to erode into the environment.

***RI/FFS* Background.** RI activities were conducted at the 12th Street Landfill by the Kalamazoo River Study Group (KRSG) whose members include Georgia-Pacific Corporation, Allied Paper, Inc./HM Holdings, Simpson Plainwell Paper Company, and James River Corporation. KRSG members have been identified as potentially responsible parties and have agreed to conduct the RI/FFS on the site under an Administrative Order by Consent. The RI was completed in four phases, consisting of a test pit investigation conducted in May 1993; soil and groundwater



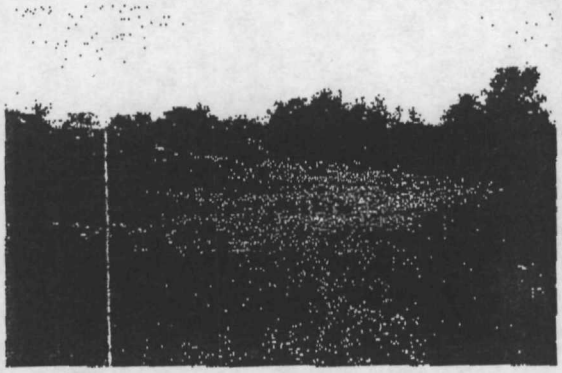
Site layout map

sampling conducted from July through September 1993; river sediment sampling conducted in June 1994; and a supplementary groundwater sampling event conducted in August 1995.

Investigation Findings. The 12th Street Landfill is comprised primarily of paper-making residuals, with a small amount of construction debris at the south end of the site. A thin surface layer of residuals extends beyond the side of the 12th Street Landfill into the wetlands to the north and west and into the open area to the southeast. Residuals contiguous to the landfill are also present to the east along the river bank and extend into the Kalamazoo River. The total volume of residuals and construction debris in the landfill is estimated to be 208,000 cubic yards. The volume of residuals extending beyond the landfill boundary is estimated to be 2,300 cubic yards.

Sixteen test pits were excavated within the 12th Street Landfill OU to evaluate the causes of electric/magnetic anomalies at the site. The test pits were excavated with a backhoe to an estimated depth of 2 feet above the landfill base. The results of the test pit investigation indicated the electric/magnetic anomalies to be a result of wire, several empty drums and construction debris buried within the landfill.

RI activities conducted at the 12th Street Landfill OU also included the completion of 14 hand-auger borings; 22 soil borings; 15 groundwater monitoring wells; 3 leachate monitoring wells; and two river gauges. Sample locations are shown on the Site Layout Map.



Top of 12th Street Landfill covered with native grasses

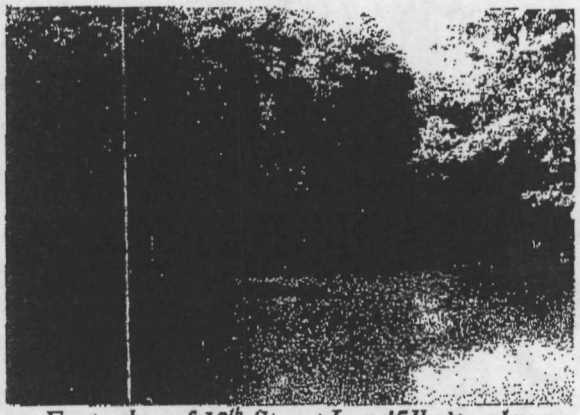
PCBs are the primary constituent of concern at the 12th Street Landfill. PCBs have been detected in the residuals, but not in groundwater at the site. In general, lower PCB concentrations are found in the shallow residuals (7.2 milligrams per kilogram [mg/kg] average for the 2 to 18 foot depth interval), relative to deep residuals (42.4 mg/kg average for the 18 to 28 foot depth interval). The average and maximum detected PCB concentrations are 19 mg/kg and 158 mg/kg, respectively. Soils directly beneath the landfill were found to contain PCBs at concentrations one to two orders of magnitude lower than residuals immediately above them. Samples of residuals collected from the Kalamazoo River bottom adjacent to the landfill averaged 23 mg/kg. Additional information regarding constituents present at the 12th Street Landfill is provided in the RI report and supporting documents

◆ *Evaluation of Site Risks* ◆

The RI report for the 12th Street Landfill concluded that PCBs are present in surface soils and residuals outside of the landfill boundary. Similarly, the RI report for the King Highway Landfill OU, another landfill that is part of this Superfund site, indicated there to be comparable levels of PCBs in surface soils and residuals outside of the landfill boundary at that site.

An RA was conducted for the King Highway Landfill OU to assess the human health and environmental risks that could result if the site were not remediated. Due to the similarities between the King Highway Landfill OU and the 12th Street Landfill OU, the RA for the former was used to assess human health and environmental risk at the 12th Street Landfill. The results of the King Highway Landfill OU RA indicated that the primary exposure pathway to be addressed by the site remedy was the potential release of PCB-containing residuals to the Kalamazoo River. In addition, the RA results indicate that if the site is not remediated, PCBs in surface soils and residuals outside the landfill boundary represent a potential risk to workers and trespassers at the landfill, and to anglers along the river adjacent to the landfill. Although the PCB uptake potential of plants is low, animals may accumulate harmful levels of PCBs through the food chain. Several animal burrow holes were observed within the 12th Street Landfill during the RI.

Based upon the overall similarity of the physical characteristics and chemicals of concern present at the 12th Street Landfill and King Highway Landfill OUs, the findings from the RA conducted for the King Highway Landfill Operable Unit are relevant to the 12th Street Landfill Operable Unit.



East edge of 12th Street Landfill site along Kalamazoo River

Comparison of Risks and Remediation Goals. Actual or threatened releases of hazardous substances from this site, if not addressed by the preferred alternative, may present a potential threat to public health, welfare, or the environment. The primary exposure pathway to be addressed by remedial alternatives is the potential exposure to PCBs in surface soils and residuals outside of the landfill boundary within the wetlands, adjacent areas and the Kalamazoo River. The main remediation goal is therefore to restrict exposure to, and migration of, the PCB-containing residuals at the site.

◆ *Presumptive Remedy Approach* ◆

To accelerate remedial action implementation, the MDEQ supports the use of a containment type (i.e., landfill capping) presumptive remedy for this landfill OU. Presumptive remedies are preferred remedial technologies for certain types of sites, such as landfills, based on EPA's experience with remedy selection and performance. The preferred alternative identified in this proposed plan was developed in accordance with EPA guidance on developing and using presumptive remedies at Superfund sites.

As reflected in the King Highway Landfill FFS, which evaluated seven (7) types of remedial technologies and sixty (60) different process options, containment was determined to be the most appropriate type of remedy for restricting exposure to, and migration of, the PCB-containing residuals at that site. Based on the close similarities between the two OUs, a containment presumptive remedy is also appropriate for the 12th Street Landfill OU.

A more detailed discussion on the rationale for using a presumptive remedy approach for the 12th Street Landfill OU is presented in the FFS report.

◆ *Summary of Remedial Alternatives* ◆

A feasibility study under the presumptive remedy approach is streamlined by limiting the remedial alternatives evaluation to the no-action alternative and the presumptive remedy alternative. Thus, for the 12th Street Landfill OU, the following two alternatives were developed:

Alternative 1: No-Action

Alternative 2: Landfill Closure (consolidation of outlying residuals, Michigan NREPA 451, Part 115 cap, institutional controls)

The two alternatives are described below.

Alternative 1: No-Action

Alternative 1 is the no-action alternative and serves as the basis against which other alternatives (in this case, the presumptive remedy) are compared. Under this alternative, existing controls (e.g., soil cover) would continue to be used to contain residuals at the landfill, with no additional provisions for monitoring of the

environmental media surrounding the landfill. According to the *National Contingency Plan (NCP)*, the no-action alternative must be assessed as part of the detailed analysis of remedial alternatives.

There are no capital or operation and maintenance (O&M) costs associated with the implementation of the no-action alternative.

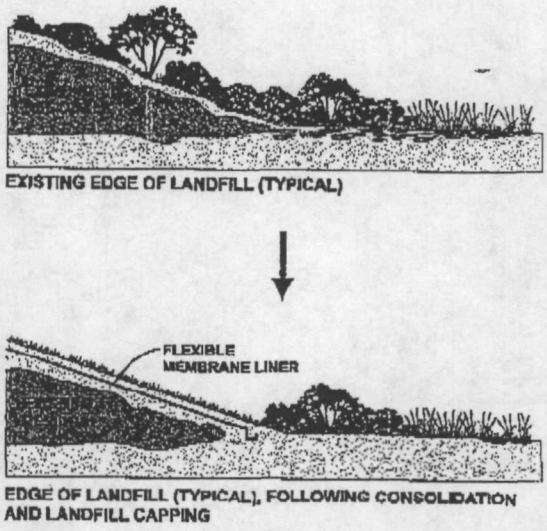
Cost and Implementation Time Frame for Alternative 1: No-Action

Capital Costs = $0
O&M Costs = $0/yr
Net Present Worth = $0
Implementation Time Frame = Not Applicable

Alternative 2: Landfill Closure

Alternative 2 is the landfill closure alternative. This alternative includes the following remedial components:

- Consolidation of PCB-contaminated residuals present beyond the landfill boundaries into the main body of the landfill prior to capping.
- Regrading the landfill surface as necessary to promote proper drainage and containment of the enclosed materials.
- Installation of a flexible membrane liner landfill cap in compliance with Michigan NREPA 451, Part 115 to contain/isolate residual materials and prevent water infiltration.
- Site fencing and access limitations.
- Deed restrictions to limit future land use at the site.
- Implementation of a long-term monitoring program to ensure effectiveness of the remedy and determine the need for repair.



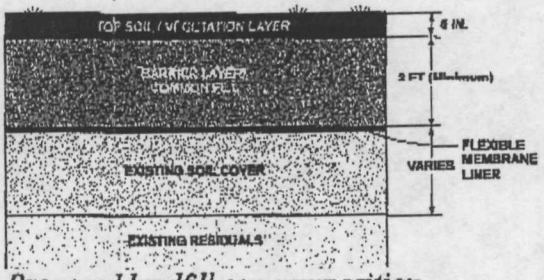
Proposed residual consolidation, landfill capping and revegetation

Prior to installing the landfill cap, the residuals present outside of the landfill boundaries will be consolidated into the main body of the landfill. These outlying residuals include those which extend into the wetlands located immediately to the north and west of the landfill and east along the banks, as well as those which extend into the Kalamazoo River.

Following consolidation activities, the landfill will be capped in accordance with Michigan NREPA 451, Part 115 requirements for a *Type III landfill* (i.e., industrial waste landfill). The final cover will be comprised of an erosion layer underlain by a barrier layer. The erosion layer will consist of a minimum of 6 inches of earthen material suitable for supporting native plant growth. For the 12th Street Landfill, the barrier layer shall be comprised of a low permeability flexible membrane

liner that is properly sloped and overlaid by a frost protection layer thick enough to provide adequate freeze/thaw protection (at least 2 feet of soil). The necessity of a gas venting layer will be considered during remedial design. The proposed composition of the Michigan NREPA 451, Part 115 landfill cap is illustrated on the figure below.

To increase the stability of the Kalamazoo River side of the 12th Street Landfill and provide erosion control, Alternative 2 includes the potential placement of erosion control materials (e.g., *rip-rap*) along the river-side and along the other side slopes of the landfill. The portion of the landfill side slopes to be stabilized, if any, will be determined during remedial design.



Proposed landfill cap composition

In addition to consolidating the outlying residuals and capping the landfill, this alternative also includes institutional controls to limit site access and future land use. These will include permanent site fencing and execution of deed restrictions. Lastly, a long-term groundwater monitoring program would be developed and implemented to assess the effectiveness of the landfill cap in preventing potential off-site migration of contaminants.

Cost and Implementation Time Frame for Alternative 2: Landfill Closure

Capital Costs = $1,655,040
O&M Costs = $14,000/yr
Net Present Worth = $1,828,800
Implementation Time Frame = One year or less

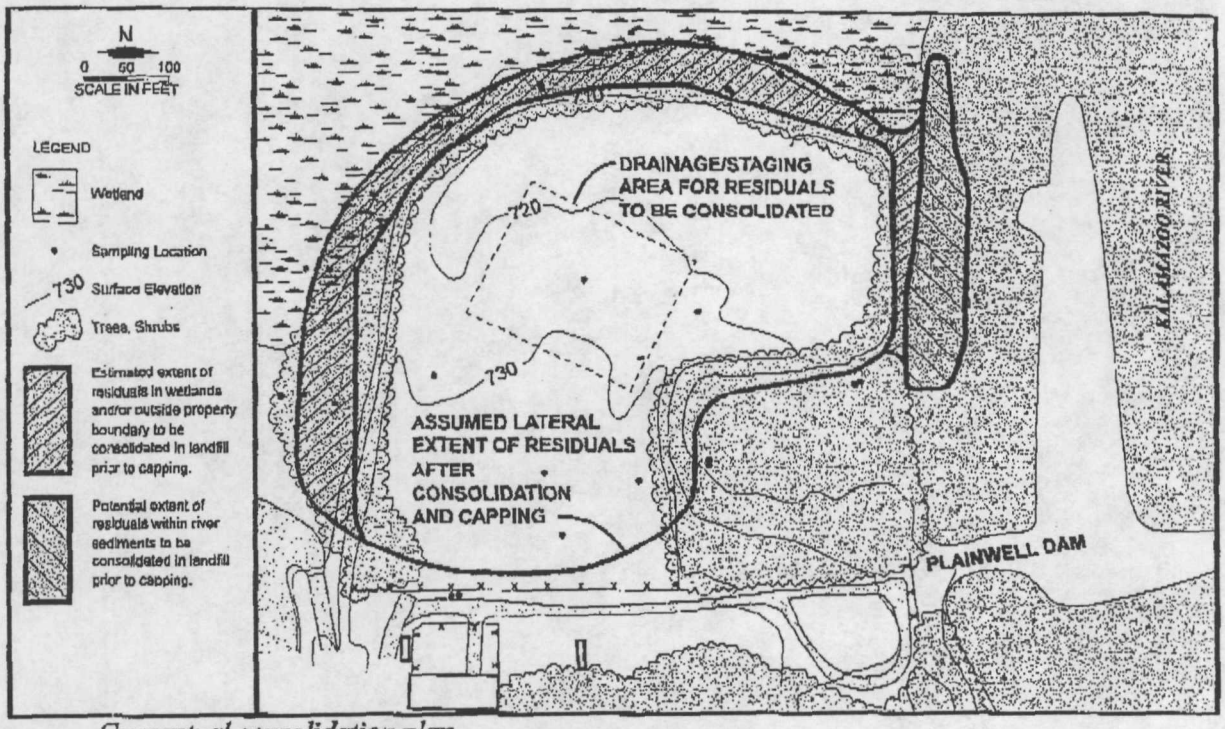
◆ *Evaluation of Alternatives and the Preferred Alternative* ◆

Preferred Alternative - As concluded from the results of the FFS, the preferred alternative for remediating the 12th Street Landfill OU is Alternative 2 - Landfill Closure including consolidation of outlying residuals, Michigan NREPA 451, Part 115 landfill cap, and institutional controls. Based on information currently available, this preferred alternative best satisfies the nine criteria used to evaluate alternatives, as discussed below.

Evaluation Criteria - In accordance with EPA guidance and the NCP, the remedial alternatives were evaluated against the nine evaluation criteria listed below:

1. Overall protection of human health and the environment.
2. Compliance with *applicable or relevant and appropriate requirements (ARARs)*.
3. Long-term effectiveness and permanence.
4. Reduction of toxicity, mobility, or volume through treatment.
5. Short-term effectiveness.
6. Implementability.
7. Cost.
8. Support agency acceptance.
9. Community acceptance.

The nine evaluation criteria are grouped into three categories as follows: threshold criteria, primary balancing criteria, and modifying criteria. The threshold criteria include the minimum requirements that must be met by a selected remedy. The primary balancing criteria are used to assess the main trade-offs between the remedial alternatives. The



Conceptual consolidation plan

modifying criteria are used to assess support agency and community acceptance following public comment on the Proposed Plan. The following presents a profile of Alternatives 1 and 2 evaluated against the nine criteria.

Overall Protection of Human Health and the Environment (Threshold Criterion) - This criterion assesses whether alternatives adequately protect human health and the environment. The degree to which an alternative eliminates, reduces, or controls the risk to human health and the environment through treatment, engineering, or institutional controls is assessed using this criterion.

Alternative 2 would provide adequate protection of human health and the environment by eliminating, reducing, or controlling current site risks through consolidation of outlying residuals, construction of an engineered landfill cap, side slope stabilization and/or erosion control, and institutional controls.

Alternative 1 would not provide any administrative or control measures for ensuring that exposure to, or off-site migration of, the residuals does not occur. Thus, Alternative 1 would not provide adequate protection of human health and the environment. Because Alternative 1 does not satisfy this threshold criterion, it is not eligible for selection as the site remedy and does not need to be assessed against the remainder of the evaluation criteria.

Compliance with ARARs (Threshold Criterion) - This criterion determines whether a remedial alternative meets all of its ARARs under federal and state laws and, if not, whether an ARAR waiver is justified. Alternative 2 would meet the substantive requirements of all ARARs, including Michigan's NREPA 451, Part 115 landfill capping requirements and Part 201 environmental response requirements. *

Long-Term Effectiveness and Permanence (Primary Balancing Criterion) - This criterion

assesses whether a remedial alternative would carry a potential, continual risk to human health and the environment after implementation of the remedial action. Alternative 2 would provide a high degree of long-term effectiveness and permanence through consolidation of the outlying residuals, installation and maintenance of a Michigan NREPA 451, Part 115 landfill cap containment system, erosion control features, monitoring, and institutional controls.

Reduction of Toxicity, Mobility, or Volume Through Treatment (Primary Balancing Criterion) - This criterion assesses to what degree a remedial alternative, by utilizing treatment technologies, would permanently and significantly reduce the toxicity, mobility or volume of the hazardous substances at the site. Neither alternative would employ remedial measures that would reduce the toxicity, mobility, or volume through treatment.

Short-Term Effectiveness (Primary Balancing Criterion) - This criterion assesses the degree to which human health and the environment would be impacted during the construction and implementation of the remedial alternative. Alternative 2 has some short-term potential impacts associated with dust-borne and/or surface run-off releases of residuals during consolidation and landfill capping activities. To minimize potential short-term impacts, remedy implementation will be conducted in accordance with proper health and safety procedures. For example, strict dust control provisions will be taken to reduce worker exposure and off-site migration of residuals. During implementation of Alternative 2 consolidation activities will be conducted in a manner to minimize impact to surface water quality.

Implementability (Primary Balancing Criterion) - This criterion assesses the technical and administrative feasibility of implementing a remedial alternative and the availability of services and materials required during implementation. The remedial components comprising Alternative 2 could all be readily implemented and reliably designed and constructed. It is projected that this alternative could be implemented within a 12 month period.

Costs (Primary Balancing Criterion) - This criterion assesses the capital costs, O&M costs, and *total present worth* associated with implementing a remedial alternative. The capital cost associated with implementing Alternative 2 is estimated to be $1,655,040. The annual O&M costs associated with Alternative 2 are estimated to be $14,000/year. By applying a 7 percent discount rate over a 30 year implementation period, the total present worth associated with Alternative 2 is estimated to be $1,828,800.

Support Agency Acceptance (Modifying Criterion) - This criterion indicates whether the EPA, based on its review of the Proposed Plan and comparison with Federal Laws, concurs with, opposes, or has no comment on the preferred alternative.

Community Acceptance (Modifying Criterion) - This criterion assesses the issues and concerns the public may have regarding each of the remedial alternatives. The assessment of community acceptance will be made after completing the public comment period in which the public will have an opportunity to comment on this Proposed Plan.

◆ *Community Participation* ◆

The MDEQ is requesting your input on the remediation methods described in this

Proposed Plan. A 30-day public comment period begins on August 1 and continues through August 30, 1997. A public meeting will be held during the comment period where the MDEQ will present the Proposed Plan and accept both written and oral comments. The public meeting is scheduled for August 13, 1997. Comments can be sent postmarked no later than August 30, 1997 to the MDEQ address listed below. Comments can also be E-mailed or faxed by August 30, 1997. For your convenience, a mailing list/comment return mailer is attached to this document. The MDEQ's response to relevant public comments will be provided in the Responsiveness Summary section of the ROD.

This document is issued under Section 117(a) of CERCLA and was prepared in accordance with the EPA's Guidance on Preparing Superfund Decision Documents.

To send comments or obtain further information, please contact:

Mr. Scott D. Cornelius, Project Manager
MDEQ Environmental Response Division
Superfund Section
P.O. Box 30426
Lansing, Michigan 48909
(517) 373-7367, phone
(518) 335-4887, fax
E-Mail Address: cornels@deq.state.mi.us

U.S. EPA Contact:
Mr. Richard Boice
Remedial Project Manager
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604
(312) 886-4740 phone
(800) 621-8431, switchboard

Locations of the Site Information Repositories

Allegan Public Library
331 Hubbard Street
Allegan, Michigan
(616) 673-4525

Kalamazoo Public Library
315 South Rose
Kalamazoo, Michigan
(616) 342-9837

Charles Ransom Library
180 South Sherwood
Plainwell, Michigan
(616) 685-8021

Otsego District Library
219 South Farmer
Otsego, Michigan
(616) 694-9690

Saugatuck-Douglas District Library
Center Street
Douglas, Michigan 49406
616-857-8241

Waldo Library
Western Michigan University
Kalamazoo, Michigan
(616) 387-5150

Glossary

Applicable or Relevant and Appropriate Requirements (ARARs) - the Federal and State requirements that a selected remedy will attain. These requirements may vary between alternatives.

Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) - CERCLA, or more commonly "Superfund", was authorized by Congress in 1980 and established the National Priorities List (NPL), the National Contingency Plan (NCP), and a system of liability for potentially responsible parties (PRPs) to remediate or pay for remediation at hazardous waste sites.

Michigan NREPA 451, Part 115- Michigan's Solid Waste Management Program.

National Contingency Plan (NCP) - the Federal regulation that sets the framework for the Superfund program. The NCP identifies the governmental organizations involved in the remedial response, outlines their roles and responsibilities, and discusses the interrelationships of these organizations. In addition, the NCP provides guidelines for planning and conducting response activities. **National Priorities List (NPL)** - is the EPA's list of uncontrolled or abandoned hazardous waste sites eligible for long-term cleanup under the Superfund Remedial Program.

Operable Unit (OU) - A discrete component of a Superfund site, segregated by such characteristics as geographical location or environmental medium.

Polychlorinated Biphenyls (PCBs) - a class of 209 discrete chemical compounds, in which one to ten chlorine atoms are attached to a biphenyl molecule. PCBs are a hazardous substance and probable human carcinogen. PCBs also bioaccumulate in the food chain and are very persistent in the environment.

Record of Decision (ROD) - a public document that explains which cleanup alternative will be used at a National Priorities List site and the reasons for choosing the cleanup alternative over other possibilities.

Remedial Investigation/Focused Feasibility Study (RI/FFS) - two distinct but related studies, normally conducted together, intended to define the nature and extent of contamination at a site and to evaluate appropriate, site-specific remedies.

Residuals - byproducts associated with the manufacturing of paper.

Rip-Rap - an erosion control measure consisting of large rocks placed along a river bank.

Risk Assessment - an assessment which provides an evaluation of the risk to human health and the environment in the absence of remedial action.

Total Present Worth - an economic term used to describe today's cost for a Superfund cleanup and reflect the discounted value of future costs. A total present worth cost estimate includes construction and future operation and maintenance costs.

Type III Landfill - A sanitary landfill that is not a municipal solid waste landfill or a hazardous waste landfill. According to Michigan *Act 451, Part 115*, commercial/demolition waste landfills and industrial waste landfills are classified as Type III.

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Proposed Plan Fact Sheet
12th Street Landfill
Operable Unit No. 4

A Public Meeting will be held
Wednesday, August 13, 1997
at 7:00 PM

At the Plainwell Comfort Inn
(616-685-2891) located at
622 Allegan Highway in
Plainwell, Michigan

Comments may be submitted either verbally or in writing at the public meeting, or you can send written comments postmarked no later than August 30, 1997 to the MDEQ. Comments can also be E-mailed or faxed by August 30, 1997 (see Page 10 for MDEQ addresses and fax number).

MDEQ
ERD-SUPERFUND SECTION
P.O. Box 30426
Lansing, MI 48909-7926

MAILING LIST / PUBLIC COMMENT RETURN MAILER

If you did not receive this Proposed Plan Fact Sheet by mail, you are not on the allied Paper, Inc./Portage Creek/Kalamazoo River Superfund site mailing list. If you wish to be placed on the mailing list, please print your name and address below, and then fold, tape, stamp, and mail this form to:

MDEQ-ERD
Superfund Section
PO Box 30426
Lansing, Michigan 48909-7926

NAME: _____

ADDRESS: _____

_____

_____

CITY/STATE: _____ ZIP: _____

REPRESENTING: _____

DAY-TIME PHONE NUMBER: _____

KHL-OU Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund site

Or you may contact Mr. Scott Cornelius of the MDEQ at 517-373-7367.

The MDEQ and the EPA want to hear from you regarding the Allied Paper, Inc./Portage Creek/Kalamazoo river Superfund site and the proposed remedial action described in this Proposed Plan for the 12th Street Landfill Operable Unit. You may use the space below to comment on this proposed plan. You may mail you comments on this form by August 30, 1997 to the MDEQ Projct Manager of attend the Public Meeting scheduled for August 13, 1997, and present your comments during the meeting. You may also call the Project Manager at the number provided above.

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(attach additional sheets as necessary)

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